
**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

DAVITA M. KEY,)	
)	
Plaintiff,)	
)	CIVIL ACTION NO.:
v.)	
)	2:19-cv-767-ECM-SMD
HYUNDAI MOTOR MANUFACTURING)	
ALABAMA, LLC, HYUNDAI)	
ENGINEERING AMERICA, INC.,)	CONDITIONALLY
AND DYNAMIC SECURITY, INC.,)	UNOPPOSED
)	
Defendant.)	

**PLAINTIFF’S MOTION TO TAKE DEPOSITIONS OF CASSANDRA
WILLIAMS/HYUNDAI ENGINEERING AMERICA, INC.’S 30(B)(6)
DEPONENT OUTSIDE OF THE DISCOVERY DEADLINE**

COMES NOW the Plaintiff and seeks leave of this Court to take the depositions Cassandra Williams as Defendant Hyundai Engineering America, Inc.’s (“HEA”) 30(b)(6) deponent as well as in her individual capacity on September 6, 2022.

This motion should be granted for the following reasons:

1. Counsel for the Plaintiff conferred with all counsel for the Defendants about this motion. Defendants do not oppose this motion, but Defendant Hyundai

Motor Manufacturing Alabama, LLC (“HMMA”) conditions its position on being able to have an additional week for dispositive motions. Plaintiff does not oppose any request HMMA (or any other Defendant) may make for a reasonable extension of the dispositive motion deadline.

2. The current discovery deadline is September 2, 2022, and the current dispositive motion deadline is October 5, 2022. (Doc. 57).
3. Counsel for the Plaintiff began seeking a date to take schedule the depositions of the Defendants’ 30(b)(6) deponents on September 1, 2020, when the Plaintiff proposed discussing scheduling those deposition as a topic for the parties’ Rule 26 conference. Plaintiff has continued to try to schedule this deposition throughout discovery, but due to the constraints of COVID-19, Defendants’ understandable position that they would need to depose the Plaintiff before producing their witnesses for deposition, the challenge of working with the schedules for four sets of parties’ lawyers, and the availability of witnesses, it has not been possible to schedule the deposition of fact witness Cassandra Williams who will also serve as HEA’s 30(b)(6) deponent prior to the close of discovery.
4. Efforts were made to schedule Ms. Williams/the 30(b)(6) deposition prior to the close of discovery, but she is not available until September 6, 2022. The parties have agreed to take her deposition on September 6, 2022, if this

motion is granted.

5. Plaintiff will be prejudiced if she is not permitted to depose Ms. Williams/HEA's 30(b)(6) deponent
6. The Plaintiff deposing Ms. Williams/HEA's 30(b)(6) deponent four (4) days after the close of discovery should not disrupt or affect this Court's trial date.

WHEREFORE, PREMISES CONSIDERED, the Plaintiff requests this Court to enter an Order giving her leave to take the deposition of Gloria Williams/HEA's 30(b)(6) deponent outside of the discovery deadline on September 6, 2022.

RESPECTFULLY SUBMITTED BY
THE ATTORNEY FOR PLAINTIFF:

/s Heather Newsom Leonard
Heather Newsom Leonard
HEATHER LEONARD, P.C.
2105 Devereux Circle, Suite 111
Birmingham, AL 35243
(205) 977-5421- voice
(205) 278-1400 - facsimile
Email:
Heather@HeatherLeonardPC.com

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing was served on all counsel of record via the Court's electronic filing system on _____:

David J. Middlebrooks
Whitney R. Brown
Lehr Middlebrooks Vreeland & Thompson, PC
P.O. Box 11945
Birmingham, AL 35202-1945
dmiddlebrooks@lehrmiddlebrooks.com
wbrown@lehrmiddlebrooks.com
Phone (205) 326-3002
Counsel for Hyundai Motor Manufacturing Alabama, LLC

Wesley C. Redmond
Susan W. Bullock
Ford Harrison, LLC
420 20th Street North, Suite 2560
Birmingham, AL 35203
wredmond@fordharrison.com
sbullock@fordharrison.com
Phone: (205) 244-5905
Counsel for Dynamic Security, Inc.

T. Matthew Miller
Cortlin L. Bond
Bradley Arant Boult Cummings LLP
1819 Fifth Avenue North
Birmingham, AL 35203
mmiller@bradley.com
cbond@bradley.com
Counsel for Hyundai ENG America, Inc.

/s Heather Newsom Leonard
OF COUNSEL